

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IRENE SIMMONS AND RODELL)	
SANDERS, for themselves and others)	Case No. 1:20-CV-1128
similarly situated,)	
)	
Plaintiffs,)	Judge John J. Tharp Jr.
)	
v.)	Magistrate Judge Jeannice W. Appenteng
)	
MOTOROLA SOLUTIONS, INC., and)	
VIGILANT SOLUTIONS, LLC,)	
)	
Defendants.)	

JOINT STATUS REPORT

Under the Court's December 5, 2024 Minute Entry (Dkt. 169), Plaintiffs Irene Simmons and Rodell Sanders and Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC, through their respective counsel, respectfully submit this joint status report.

The Parties have collected most of the signatures to the Settlement Agreement and anticipate having the last two remaining signatures early next week. Upon execution of the Settlement Agreement by all parties, Plaintiffs will promptly move for preliminary approval of the Settlement Agreement in the pending state case in Cook County Circuit Court, *Simmons v. Motorola Solutions, Inc.*, 2024L010142 (Cook Cnty. Cir. Ct.).

Therefore, the Parties respectfully request that the Court continue to stay ruling on Defendants' pending motion for summary judgment (Dkt. 111) and schedule a due date for another status report in 30 days.

[Signature Page follows.]

DATED: January 10, 2025

PLAINTIFFS IRENE SIMMONS and
RODELL SANDERS

/s/ Michael I. Kanovitz
One of their attorneys

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Respectfully submitted,

DEFENDANTS MOTOROLA SOLUTIONS,
INC. and VIGILANT SOLUTIONS, LLC

/s/ David C. Layden
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